

201-14874

BPD/BPA Coalition

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November 29, 2003

The Honorable Mike Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

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Re: BPD/BPA Coalition Submission of HPV Test Plan and Robust Summaries under the Chemical Right-to-Know Program for Benzene Phosphorous Dichloride (CAS No. 644-97-3) and Phenylphosphinic Acid (CAS No. 1779-48-2).

Dear Administrator Leavitt:

The BPD/BPA Coalition submits the attached test plan for Benzene Phosphorous Dichloride (BPD - CAS No. 644-97-3) and Phenylphosphinic Acid (BPA - CAS No. 1779-48-2) under the High Production Volume Chemicals Challenge Program. Robust summaries for the HPV chemicals BPD and BPA are also included. In addition, robust summaries are included for PPOA (phosphonic acid, phenyl-) (CAS# 1571-33-1) which, although not an HPV chemical, is, under non-manufacturing conditions, a major hydrolysis product of BPD. As documented in the test plan, BPA serves as the appropriate surrogate for BPD and its hydrolysis products, including PPOA for the purposes of the program. The test plan also includes a detailed discussion of the hydrolysis of BPD under manufacturing and non-manufacturing conditions.

The BPD/BPA Coalition is currently comprised of Ferro Corporation and Akzo-Nobel Functional Chemicals LLC. Avecia was a member of the coalition, but has recently disposed of its BPD-related product line.

Please direct any comments to the BPD/BPA Coalition Executive Director, William Smock at William.smock@verizon.net.

William H. Smock
Executive Director